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May 20, 2008

VIA FACSIMILE AND ECF

Honorable Richard J. Holwell
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Lucille Orillaneda v. The French Culinary Institute
a/k/a Bear Cove, LLC**

Docket No. : 07 CV 3206
Our File No. : 00469.10507

Dear Judge Holwell:

This firm represents defendant The French Culinary Institute a/k/a Bear Cove, LLC, ("FCI") in the captioned matter. We write to request judicial intervention with respect to outstanding discovery disputes, which persist despite defendant's good faith efforts to resolve these issues. Discovery is scheduled to close on May 31, 2008 and a status conference is scheduled for June 10, 2008.

On April 25 and May 12, 2008, we wrote to plaintiff's counsel setting forth plaintiff's discovery deficiencies which include plaintiff's failure to: (1) sufficiently respond to Defendant's Second Set of Document Demands, (2) verify her responses to Defendant's First Set of Interrogatories, and (3) provide responsive documents to defendant's requests regarding her allegations. Additionally, we left several voicemail messages for plaintiff's counsel during the week of May 12, 2008 and on May 19 and 20, 2008, regarding various discovery issues. To date, plaintiff's counsel has not returned any of our telephone calls or responded to our April 25th or May 12th letters.

As there are depositions scheduled for May 21 and for May 29, 2008 (pending confirmation from plaintiff's counsel) and discovery is set to close on May 31, 2008, defendant respectfully requests the Court's assistance in resolving these outstanding discovery issues.

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Thank you for your consideration of this request.

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP

A handwritten signature in black ink, appearing to read 'Shivani Soni', with a long horizontal flourish extending to the right.

Shivani Soni

cc: Elizabeth A. Mason (via facsimile)
Attorney for Plaintiff
Law Offices of Elizabeth A. Mason
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